

No. 25-11612

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

BEAR WARRIORS UNITED, INC., a Florida Not for Profit Corporation,

Plaintiff-Appellee,

v.

ALEXIS LAMBERT, in her official capacity as Secretary of the FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION,

Defendant-Appellant.

On Appeal from the United States District Court
for the Middle District of Florida
No. 6:22-cv-02048-CEM-LHP
Honorable Carlos E. Mendoza

**UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR
APPELLEE**

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CERTIFICATE OF INTERESTED PERSONS

Pursuant to Federal Rule of Appellate Procedure 26.1 and Eleventh Circuit Rule 26.1-1 and 26.1-2, the undersigned counsel certifies that the following listed persons and parties may have an interest in the outcome of this case:

1. Bear Warriors United, Inc. – Appellee
2. Blackner, Lesley, G. – Counsel for Appellee Bear Warriors United, Inc.
3. Blome, Jessica L. – Counsel for Appellee Bear Warriors United, Inc.
4. Brown, Jeffrey – Counsel for Appellant Secretary Lambert
5. Corbani, Kelley F. – Counsel for Appellant Secretary Lambert
6. Consovoy McCarthy PLLC – Counsel for Appellant Secretary Lambert
7. Greenfire Law, PC – Counsel for Appellee Bear Warriors United, Inc.
8. Harris, Jeffrey M. – Counsel for Appellant Secretary Lambert
9. Lambert, Alexis, in her official capacity as Secretary of the Florida Department of Environmental Protection – Appellant
10. Mendoza, Honorable Carlos E. – Judge for the United States District Court of the Middle District of Florida
11. Price, Honorable Leslie H. – Magistrate Judge for the United States District Court for the Middle District of Florida
12. Venable, Nicholas B. – Counsel for Appellant Secretary Lambert
13. Weir, Bryan – Counsel for Appellant Secretary Lambert

Dated: July 9, 2025

/s/ Lesley Blackner
Lesley Blackner
Counsel for Plaintiff-Appellee

MOTION TO WITHDRAW AS COUNSEL

Undersigned counsel, Lesley Blackner, seeks leave to withdraw as counsel for Appellee, Bear Warriors United, Inc., in this appeal and in support thereof states:

1. Appellee is fully represented and will continue to be represented before this Court by Jessica Blome, Greenfire Law, PC.
2. On June 17, 2025, Plaintiff's Executive Director Katrina Shadix expressly terminated the undersigned counsel in this action via email over disagreements regarding undersigned counsel's volunteer assistance to Bear Warriors United. Ms. Shadix directed the undersigned counsel to withdraw from both the district court action and the instant appeal.
3. On July 8, 2025, the district court entered its order granting withdrawal in this action by undersigned counsel.
4. Undersigned counsel conferred with Appellant's counsel Jeff Brown, who does not oppose this motion.
5. Undersigned counsel will provide this motion to Katrina Shadix, Executive Director of Bear Warriors United, Inc. via email (bearwarriorsunited@gmail.com) and first-class US Mail.
6. The withdrawal by the undersigned counsel from this appeal will not delay or hinder the proceedings.

7. Good cause exists to allow for undersigned counsel's withdrawal given that undersigned counsel has been explicitly terminated by Appellee and Appellee continues to be well represented before this Court.

Wherefore, the undersigned respectfully requests that this Court issue an Order granting undersigned counsel's withdrawal as counsel for Appellee in this proceeding and declare the undersigned shall have no further responsibilities in this proceeding.

Dated: July 9, 2025,

Respectfully submitted,

/s/ Lesley Blackner

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CERTIFICATE OF COMPLIANCE

This motion complies with Rule 27 because it contains 6 words excluding the parts that can be excluded. It also complies with Rule 32(a)(5)-(6) because it is prepared in a proportionally spaced font using Microsoft Word in 14-point Times Roman font.

CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2025, I electronically filed the foregoing motion with the Clerk of the Court for the United States Court of Appeals for the Eleventh Circuit by using the CM/ECF system. I have also emailed on this date the foregoing to Bear Warriors United, Inc.'s Executive Director, Katrina Shadix at bearwarriorsunited@gmail.com and mailed the foregoing via US mail to Ms. Shadix at P. O. Box 622621, Oviedo, FL 32762-2621.

Dated: July 9, 2025.

/s/ Lesley Blackner
Lesley Blackner
Counsel for Plaintiff-Appellee